

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MILTON FELIX ROSADO and : CHAPTER 13
MARIANNE ROSADO :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
MILTON FELIX ROSADO and :
MARIANNE ROSADO :
Respondents : CASE NO. 5-24-bk-00220

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 11th day of March, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' and for the following reason(s):

1. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the plan, as required by the Mean Test.
2. The Trustee avers that debtors' plan is not feasible based upon the following:
 - a. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court. (Claim #5 arrears)

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19th day of March, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Timothy Fisher, II, Esquire
P.O. Box 396
Gouldsboro, PA 18424

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee